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Attorneys for Mr. Warwick

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JOHN A. HOUSTON)

UNITED STATES OF AMERICA,)	Case No. 08CR0143-JAH
)	
Plaintiff,)	Date: August 4, 2008
)	Time: 10:30 a.m.
v.)	
)	MOTION FOR ORDER
DONALD WAYNE WARWICK,)	<u>TO SHORTEN TIME</u>
)	
Defendant.)	

The above-named defendant, by and through counsel, moves this Court for an order shortening time in his attached Additional Pre-Sentence Report Objections to fourteen (14) days, to be heard August 4, 2008 at 10:30 a.m., or as soon thereafter as counsel may be heard, for the following reasons:

- (1) Pursuant to the Court's rules, PSR Objections were due on July 17, 2008. I am the attorney assigned to this case.
- (2) Counsel has a heavy district court case load.
- (3) Counsel has been litigating a contested supervised release case, United States v. Ramirez, 04cr1189-LAB, that has required original briefing and preparation for a multi-witness evidentiary hearing.
- (4) Because of the press of business, the undersigned was not able to file additional PSR objections until today, July 21, 2008.

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Respectfully submitted,

DATED: July 21, 2008

/s/ Erica K. Zunkel

ERICA K. ZUNKEL

Federal Defenders of San Diego, Inc.
Attorneys for Mr. Warwick

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JOHN A. HOUSTON)

UNITED STATES OF AMERICA,)	Case No. 08CR0143-JAH
)	
Plaintiff,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
DONALD WAYNE WARWICK,)	
)	
Defendant.)	

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

David D. Leshner
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Neil R. Trop
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Shelley Seacotte, United States Probation Officer
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Respectfully submitted,

DATED: July 21, 2008

/s/ Erica K. Zunkel
ERICA K. ZUNKEL
Federal Defenders of San Diego, Inc.
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